

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

DEANNA KOEHN,

Plaintiff,

Case No. 1:22-cv-11848
Hon. Thomas L. Ludington

v.

PALACE SPORTS &
ENTERTAINMENT, LLC and
313 PRESENTS LLC,

Defendants.

THE MASTROMARCO FIRM
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STIPULATION AND ORDER TO AMEND SCHEDULING ORDER

The parties hereto, by and through their respective counsel, hereby stipulate and agree to entry of the attached Order amending the remaining dates on the Scheduling Order 90 days. Good cause exists to enter this Order as the parties seek additional time to complete discovery. Depositions have all been scheduled but have been moved due to both attorneys' trial schedules.

Plaintiff's attorneys' office addressed the following trial schedule:

1. Trial in *Keohane v. City of Key West*, Case No. 4:22-cv-10044-JEM, in the United States District Court for the District of Southern Florida, was scheduled to begin on September 11, 2023; it was subsequently adjourned on August 29, 2023 to a later date;

2. Trial in *Castanon v. United Parcel Service, Inc, et al.*, Case No. 21-044780-CD, in the Saginaw County Circuit Court, was set to begin on September 19, 2023; it was adjourned to begin on September 26, 2023 on September 5, 2023 and adjourned a second time on September 19, 2023;

3. Trial in *Harvey v. Kuelske, et al.*, Case No. 21-045795-NF, in the Saginaw County Circuit Court, was scheduled to begin on October 3, 2023; it was adjourned on September 21, 2023;

4. Trial in *Cooper v. Ascension St. Mary's Hospital, et al.*, Case No. 20-042224-NZ, in the Saginaw County Circuit Court, is set to begin on October 3, 2023, which is a date certain.

Due to numerous trials that were scheduled for September and the beginning of October, the parties were not able to reschedule the depositions in this matter.

Respectfully submitted:

/s/ Kevin J. Kelly
KEVIN J. KELLY (P74546)
Attorney for Plaintiff

/s/ T. Joseph Seward
T. JOSEPH SEWARD (P35095)
Attorney for Defendant 313 Presents

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DEANNA KOEHN,

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Honorable Thomas L. Ludington
United States District Judge

**ORDER GRANTING PARTIES' JOINT MOTION TO ADJOURN DISCOVERY
CUTOFF DATE AND DISPOSITIVE MOTION DEADLINE AND ADJOURNING
SCHEDULING ORDER**

Having reviewed the Parties' attached Stipulation, finding good cause, *see* FED. R. CIV. P. 16(b)(4), and this Court being otherwise fully advised in the premises:

It is **ORDERED** that the Scheduling Order, ECF No. 16, is **ADJOURNED** as follows:

Dispositive Motions Due:	March 1, 2024
Motions <i>in limine</i> Due:	June 18, 2024
Civil Rule 26(a)(3)(B) Disclosures Due:	June 28, 2024
Pretrial Submissions Due:	July 9, 2024
Final Pretrial Conference:	July 16, 2024 at 2:00 PM EDT
Bench Trial:	August 6, 2024 at 8:30 AM EDT

Dated: October 3, 2023

s/Thomas L. Ludington
THOMAS L. LUDINGTON
United States District Judge